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Automobile Insurance Company

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 ***

13 ROSE DESIO,

14 Plaintiff,

15 vs.

16 STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY; DOES I-V and
17 ROES VI-X, inclusive

18 Defendants.

CASE NO. 2:20-cv-1486-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
RESPONSE TO PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

[Fourth Request]

19 DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
20 ("Defendant"), by and through its counsel of record, the law firm of LEWIS BRISBOIS
21 BISGAARD & SMITH LLP, and PLAINTIFF ROSE DESIO ("Plaintiff"), by and through her
22 counsel of record, JESSE SBAIH & ASSOCIATES, LTD., hereby stipulate and agree that the
23 time for Defendant to file its Response to Plaintiff's Motion for Partial Summary Judgment be
24 extended as set forth herein. Defendant State Farm's Response is currently due January 1, 2020.
25 The parties hereby stipulate that the due date for Defendant's Response be extended to January 4,
26 2021.

27 **Reason for Extension**

28 Plaintiff's Motion for Partial Summary Judgment addresses a nuanced issue of law

1 regarding the enforceability of Defendant's anti-stacking provision in the Nevada Car Policy it
 2 issued to Plaintiff. Defendant requires additional time to address Plaintiff's claims effectively
 3 prior to filing its Response. Additionally, due to defense counsel's office closures for the end of
 4 the year holiday, defense counsel requires an extension to the next business day that is not a
 5 holiday to file Defendant's Response. This stipulation is made in good faith and not for the
 6 purpose of delay.

7 This is the fourth extension of time requested for filing Defendant's Response to Plaintiff's
 8 Motion for Partial Summary Judgment.

9 DATED this 30th day of December, 2020.

DATED this 30th day of December, 2020.

10 LEWIS BRISBOIS BISGAARD & SMITH

JESSE SBAIH & ASSOCIATES, LTD.

11 /s/ Cheryl A. Grames

/s/ Jesse M. Sbaih

12 ROBERT W. FREEMAN

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Attorneys for Plaintiff

16 Attorneys for Defendant

17 **ORDER**

18 IT IS SO ORDERED.

19 Dated this 4th day of January, 2021.

20
 21 
 22 _____
 U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of December, 2020, I electronically filed the foregoing **FOURTH STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** with the Clerk of the Court through Case Management/Electronic Filing System.

Jesse M. Sbaih
Ines Olevic-Saleh
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By /s/ Mary Bradley-Estrada
An Employee of LEWIS BRISBOIS BISGAARD
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